

### Remarks

Initially, Applicants would like to thank the Examiner for her careful review of the Application. Claims 1-20 are pending in the present application. Through the foregoing amendments and the following remarks, Applicants have attempted to address all points raised by the Examiner.

#### **Claim Rejections - 35 U.S.C. §102**

##### **35 U.S.C. §102(b) - Velamuri et al.**

The Examiner rejected claims 1-20 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,878,126 to Velamuri et al. (hereinafter "Velamuri"). The Examiner stated that Velamuri teaches the recitations of claims 1, 10, and 16. Applicants respectfully disagree. Claim 1 recites receiving into a signal switching point (SSP) a call trigger emanating from the calling device, generating a query from the SSP to a signal transfer point (STP), the query containing an identifier of the calling device, delivering the query from the STP to a signal control point (SCP), accessing location information associated with the identifier of the calling device from a database linked to the SCP, delivering the location information from the SCP to the SSP through the STP, and providing the location information from the SSP to the called device. The information that is retrieved from the database and routed from the SCP, to the SSP, and then delivered to the called party is the geographic location of the calling party. So, ultimately the calling party dials another party's phone number, and the called party receives the geographic location of the calling party.

Velamuri does not teach, suggest, or describe delivering the location information of the calling party from the signal control point, to the signal switching point via the signal transfer point, or providing the location information from the SSP to the called device. Velamuri describes a network that includes a calling party, SSPs, a STP, a SCP, and a database. The telephone of a calling party is connected to a first SSP. The first signal switching point is connected to other SSPs, all of which are connected to a signal control point. A signal transfer point is provided to route call processing queries between the SSPs and the SCP. The SCP communicates with at least one database.

The process of Velamuri begins when the calling party dials a generic number associated with a subscriber that has multiple geographic locations and local numbers associated with each. The SSP associated with the calling party recognizes a trigger, formulates a query, and sends the query to a signal transfer point. The STP routes the query to a SCP. The signal control point communicates with a database, and based on the calling party's telephone number and the generic subscriber number called, determines the appropriate local subscriber number to route the call to. The SCP then sends a message back to the signal switching point associated with the calling party containing instructions for routing the call to the appropriate subscriber location.

In contrast to embodiments of the present invention, the information retrieved from a database of Velamuri and routed to an SSP is an instruction to dial a phone number. Instead of delivering the calling party's location information to the called party like the present invention of claim 1, the SSP of Velamuri simply connects the calling party's call to the called party. In effect, the calling party dials a generic phone number, like a 1-800 number, and the call is routed to a local phone number. The called party does not receive any information as to the geographic location of the calling party because that information is not retrieved from a database, delivered to a SSP, and then delivered to the called party, as is recited by claim 1 of the present invention. Accordingly, claim 1 is allowable over Velamuri.

Claim 10 of the present invention recites a system for providing location information of a calling device to a called device comprising a signal switching point, a database, a signal control point, and a signal transfer point. The SSP is configured to receive a call trigger emanating from the calling device, produce a query for location information where the query contains an identifier of the calling device, and provide the location information to the called device. The database contains location information indexed by identifiers of calling devices. The SCP is configured to access location information from the database upon receipt of the query for location information. The STP is configured to deliver the query from the SSP to the SCP and deliver the location information from the SCP to the SSP.

As discussed above with reference to claim 1, Velamuri does not teach, suggest, or describe a SSP configured to provide the location information to the called device.

Additionally, the STP of Velamuri is not configured to deliver the location information from the SCP to the SSP. As noted above, the system of Velamuri sends instructions from the SCP to the SSP, through the STP, directing the SSP to route the call to a particular number. There is no location information regarding the calling party that accompanies this instruction, nor is there any location information that is delivered to the called party. Accordingly, claim 10 is allowable over Velamuri.

Claim 16 of the present invention recites a system for providing location information of a calling device to a called device comprising a first SSP, a second SSP, a database, a signal control point, and a signal transfer point. The first SSP is configured to receive a call trigger emanating from the calling device and transmit the call trigger and an identifier of the calling device. The second SSP is configured to receive the call trigger and identifier of the calling device transmitted from the first SSP, produce a query for location information where the query contains the identifier of the calling device, and provide the location information to the called device. The database contains location information indexed by identifiers of calling devices. The SCP is configured to access location information from the database upon receipt of the query for location information. The STP is configured to deliver the query from the SSP to the SCP and deliver the location information from the SCP to the SSP.

As discussed above with reference to claim 1, Velamuri does not teach, suggest, or describe a SSP configured to provide the location information to the called device. Additionally, the STP of Velamuri is not configured to deliver the location information from the SCP to the SSP. As noted above, the system of Velamuri sends instructions from the SCP to the SSP, through the STP, directing the SSP to route the call to a particular number. There is no location information regarding the calling party that accompanies this instruction, nor is there any location information that is delivered to the called party. Further, the process route of Velamuri begins at a calling device, to a first SSP, from the *first* SSP to a SCP, back to the *first* SSP, then through a second and third SSP to a called device. This is in contrast to the system of claim 16 wherein the process begins at a calling device, to a first SSP, to a *second* SSP, from the *second* SSP to a SCP, back to the *second* SSP, to a called device. Applicants have amended claim 16 to clearly

identify the SSP that sends the query to the SCP and receives the location information from the SCP as the *second* SSP. Accordingly, claim 16 is allowable over Velamuri.

Regarding claims 2, 4, 11, and 17, Velamuri does not teach, suggest, or describe detecting from the identifier of the called device whether to deliver location information of the calling device to the called device, delivering the location information to the signal switching point, or providing the location information to the called device. The Examiner refers to FIG. 5 of Velamuri as reciting the steps of claim 2. FIG. 5 is simply a flow chart of the process described above with reference to claim 1. As discussed above, Velamuri uses geographic information to determine where to route a call. However, Velamuri does not teach, suggest, or describe delivering location information to a called party. Since Velamuri does not deliver location information to the called party, Velamuri does not make a determination as to whether to deliver location information based on the identifier of the calling device or delivering location information to the SSP. For at least these reasons, and because claims 2, 4, 11, and 17 depend from allowable claims 1, 10, and 16, dependent claims 2, 4, 11, and 17 are allowable over Velamuri.

Regarding dependent claims 3, 12, and 18, the Examiner stated that Velamuri teaches detecting from the call trigger at the signal switching point whether a privacy indicator is provided from the calling device. Applicants respectfully disagree. Step 520 in FIG. 5, cited by the Examiner as teaching this step, describes determining whether the SCP has the calling party number. If not, the caller is prompted to enter the calling party number. In embodiments of the present invention recited in claims 3, 12, and 18, the signal switching point, not the SCP, is determining whether a privacy indicator is provided from the calling device. As described on page 6 of the specification, a privacy indicator is appropriate where the calling party has subscribed or otherwise initiated privacy service to block distribution of caller ID and location ID data. So, a privacy indicator is a caller-induced service that in effect, turns the location ID system off, whereas step 520 of Velamuri simply determines whether the SCP has the information needed to query the database. Because these steps are very different, because they take place at different locations within the systems (SSP vs SCP), and because claims 3, 12, and 18 depend from allowable claims 1, 10, and 16, dependent claims 3, 12, and 18 are allowable over Velamuri.

Regarding claims 5, 13, and 19, Velamuri teaches accessing zip code information associated with a calling party number, but Velamuri does not teach, suggest, or describe delivering that zip code information to the calling party as is recited by claims 1, 10, and 16. Because claims 5, 13, and 19 depend from allowable claims 1, 10, and 16, dependent claims 5, 13, and 19 are allowable over Velamuri.

Regarding claims 6 and 14, Velamuri does not teach, suggest, or describe the location information being planar coordinates. Velamuri teaches accessing zip code information associated with a calling party number, not planar coordinates. For at least this reason, and because claims 6 and 14 depend from allowable claims 1 and 10, claims 6 and 14 are allowable over Velamuri.

Regarding claims 7, 8, 15, and 20, these claims are allowable over Velamuri at least because they further limit allowable claims 1, 10, and 16.

Regarding claim 9, Velamuri does not teach, suggest, or describe receiving the call trigger from the calling device at an originating signal switching point and transmitting the call trigger and identifier of the calling device from the originating SSP to the SSP that generates the query. In Velamuri, the originating SSP is the SSP that generates the query rather than an SSP that receives the identifier from the originating SSP as recited in claim 9. After the query and return instructions from the SCP, the originating SSP routes the call through the SSP associated with the called party (FIG. 2, Col. 9, lines 21-50). Accordingly, for this reason and because claim 9 depends from allowable claim 1, claim 9 is allowable over Velamuri.

**Conclusion**

For at least these reasons, Applicants assert that the pending claims 1-20 are in condition for allowance. Applicants further assert that this response addresses each and every point of the Office Action, and respectfully requests that the Examiner pass this application with claims 1-20 to allowance. Should the Examiner have any questions, please contact Applicants' undersigned attorney at 404.954.5100.

Respectfully submitted,

MERCHANT & GOULD

*Leonard J. Hope*

Leonard J. Hope  
Reg. No.: 44,774

Merchant & Gould, LLC  
P.O. Box 2903  
Minneapolis, Minnesota 55402-0903  
Telephone: 404.954.5100

**39262**

PATENT TRADEMARK OFFICE